



United States of America's Unopposed Application for Stay of Proceedings – Page 1

application is consistent with governing case law, and the parties to this civil action do not oppose a stay. Accordingly, the United States respectfully applies to the Court for entry of an order staying this proceeding pending completion of the criminal matter.

Respectfully submitted,

JAMES T. JACKS
Acting United States Attorney

/s Alan M. Buie
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CERTIFICATE OF CONFERENCE

I hereby certify that on April 3, 2009, I conferred with the following counsel of record, and that each stated he or she is not opposed to the relief requested by the foregoing motion:

Leslie J. Hughes, Esquire
For Plaintiff Securities and Exchange Commission

David A. Carp, Esquire
For Defendants Ryan M. Reynolds and Bellatalia, L.P.

John Courtade, Esquire
For Defendants Timothy T. Page and Testre, L.P.

I did not attempt to confer with the following named defendants, each of which has defaulted, as evidenced by the Clerk's entry of default as to each on February 25, 2009:

Market 99, Ltd.
Griffdom Enterprises, Inc.
Jason W. Brola
Tryst Capital Group, LLC
Desmond J. Milligan

/s Alan M. Buie
ALAN M. BUIE
Assistant United States Attorney

CERTIFICATE OF SERVICE

I caused a true copy of the foregoing motion to be served on the following counsel of record by way of the Electronic Court Filing system on April 8, 2009:

Leslie J. Hughes, Esquire
For Plaintiff Securities and Exchange Commission

David A. Carp, Esquire
For Defendants Ryan M. Reynolds and Bellatalia, L.P.

John Courtade, Esquire
For Defendants Timothy T. Page and Testre, L.P.

I did not attempt to serve the following named defendants, each of which has defaulted, as evidenced by the Clerk's entry of default as to each on February 25, 2009:

Market 99, Ltd.
Griffdom Enterprises, Inc.
Jason W. Brola
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/s Alan M. Buie
ALAN M. BUIE
Assistant United States Attorney